



6/5/2014

Noize Communications LLC
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Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: FCC Proceeding 12-354

Dear Mr. Chairman and Commissioners:

We are one of over 2000 licensees that operate and do business in the 3.65-3.70 GHz as a wireless internet service provider. This is a very useful band to our operations due to the nature of it being a licensed band and a generally noise free band.

We are aware that the portion of the band that we currently occupy will probably become part of the new "Citizens Broadband Service." We feel that the new proposed requirements and restructuring of this band could be an unwelcome burden on our wireless internet business, as well as hundreds of other WISP's around the country.

Right now WISP's currently enjoy up to 25 MHz of bandwidth on this band and the proposed new "Citizens Broadband Service" will eventually only allow users access to a 10 MHz wide channel. This is a significant decrease in throughput for our backhaul links and would simply not be a viable option to our operation in the future.

It also seems that the new CBS might become a band that would require companies like ours to participate in bidding auctions along with others to secure licenses. We are a small company and this type of competitive behavior with multi-million dollar companies for spectrum would ultimately end up with the one having the most money winning the allocation. We feel that we would not stand a chance in these situations.

We strongly encourage the Commission to immediately investigate allowing re-location of current WISP licensees in the 3.65 – 3.70 GHz band to the 3.3-3.5 GHz band which would share with Part 90 and Part 97 users and to continue to maintain the "light licensing" structure that we currently are using. Existing available equipment could be re-tuned to the 3.3 – 3.5 GHz band within a short period of time. We believe the Commission would find this a more desirable solution than having to wait 5 more years for "grandfathered" users to exit the band.

Currently there is a NPRM (RM-11715) requesting to authorize wireless broadband services the ability to use the 10.0-10.5 GHz band pursuant to Part 90, Subpart Z, rules. Including the 3.3-3.5 GHz band in this active NPRM would be greatly beneficial to the wireless internet service industry as well as the general public and their ability to acquire high speed internet access in areas where there is little access or none at all. In addition, allowing wireless broadband use of the 10.0-10.5 GHz band would be very cost effective due to the fact that equipment is already being manufactured for this band for international use.

We hope the Commission will review this information and act accordingly so as to continue to create accessible, useable, and affordable spectrum allocations for WISP's such as ourselves, as well as other users of these bands for years to come.

Respectfully Submitted,

Timothy Ylinen
Co-owner
Noize Communications LLC